

December 5th, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

In Re: PS Docket No. 06-229
Written Ex Parte submission

Dear Ms. Dortch:

On Friday, December 2nd, Gino Scribano from Motorola Solutions, Inc. (MSI) sent the email copied below to Behzad Ghaffari of the Public Safety and Homeland Security Bureau. This email was sent as a follow-up to the industry discussions that took place at the recent Public Safety Communications Research (PSCR) workshop, and open PSST OAC meeting which followed. The email provided some input regarding what entity should be responsible for applying for PLMN IDs from the ATIS IOC IMSI-A committee, and how many PLMN IDs should be obtained in support of the nationwide 700 MHz Public Safety broadband wireless network.

From: Scribano Gino-QA1087 [<mailto:Gino.Scribano@motorolasolutions.com>]
Sent: Friday, December 02, 2011 08:10 AM
To: Behzad Ghaffari
Subject: PLMN ID assignment

Hello Dr. Ghaffari,

Unfortunately, we didn't get a chance to talk much during the PSCR conference. One issue that I have been thinking about since the open PSST OAC meeting yesterday is which entity should apply to the ATIS IOC IMSI-A committee for the PLMN ID(s). After some thought, it seems that the most logical entity is the FCC ERIC. The reason is that the FCC must approve any usage of a PLMN ID anyway, so direct ownership of the PLMN ID(s) by the FCC ERIC will enable an efficient and consistent methodology to grant PLMN ID usage to public safety entities.

Further, there is a lot of focus now on a single PLMN ID. And this is a good usage policy debate. However, this issue should be somewhat separate from the number of PLMN IDs that are requested from the ATIS IOC IMSI-A. As an example, many carriers have acquired several PLMN IDs, even though they are currently using a subset of those IDs. I asked a carrier representative why this is the case, and here are the reasons that he provided:

- Specifically in the US, operators are usually assigned blocks of 10 MNCs to avoid well-known interworking issues with the rest of the world where primarily 2 digit MNCs are used. That allows US operators to look as if they were using 2 digit MNCs: www.atis.org/ioc/Docs/Meetings/09-10-19/IOC-09-10-19-05.doc
- Operators may decide to use different PLMN IDs to cover different geographic areas.
- Operators may decide to use different PLMN IDs for MVNOs.

These seem like sound reasons to obtain multiple PLMN IDs from the ATIS IOC IMSI-A, even if the policy for public safety dictates that only one PLMN ID shall be used for the currently evolving nationwide network.

Best Regards,

Gino

Respectfully Submitted,

/s/ Chuck Powers

Chuck Powers

Director, Engineering and Technology Policy

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CC: (via email)

Behzad Ghaffari